

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-11340 DPW

STEPHEN KEEFE, *
Plaintiff *
 *
v. *
 *
LOCAL 805, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
LOCAL 800, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
and LOCAL 799, INTERNATIONAL *
LONGSHOREMEN'S ASSOCIATION, AFL-CIO, *
Defendants *

NOTICE OF TAKING DEPOSITION

Please take notice that at 10:00 a.m. on Friday, September 16, 2005, at the office of Scott A. Lathrop, 122 Old Ayer Road, Groton, Massachusetts, the attorney for the plaintiff in this action will take the deposition upon oral examination of Joseph Picard pursuant to Rule 30 before a Notary Public in and for the Commonwealth of Massachusetts, or before some other officer authorized by law to administer oaths. This deposition will continue from day to day until completed.

You are invited to attend and cross-examine.

Please take further notice that deponent is required to produce upon such examination the following books, records, papers, documents and/or objects:

1. Any and all documents showing any source of income, whether passive or active, since January 1, 2000;

2. Any and all documents showing any rental income, whether passive or active, since January 1, 2000;
3. Any and all documents showing any business income since January 1, 2000; and
4. Any and all tax returns, State and Federal, filed since January 1, 2000.

Stephen Keefe
By his attorney



Scott A. Lathrop, Esq.
Scott A. Lathrop & Associates
122 Old Ayer Road
Groton, MA 01450
(978) 448-8234
BBO No. 287820

Dated: August 15, 2005

Certificate of Service

I, Scott A. Lathrop, hereby certify that I have served the foregoing Notice on the defendants by mailing this day a copy to the last known address of their Attorneys of Record.



Scott A. Lathrop

Dated: August 15, 2005